



August 9, 2018

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: *Ex Parte* Communication: WC Docket Nos. 10-90, 14-58, 07-135, and CC Docket 01-92**

Dear Ms. Dortch:

On August 7, 2018, Bob DeBroux of TDS Telecom, Ken Pfister of Great Plains Communications, and Trey Judy of Hargray Communications, along with Genny Morelli and the undersigned of ITTA, met with Jay Schwarz of the Office of Chairman Pai regarding the Notice of Proposed Rulemaking (NPRM) in the above-referenced proceedings.<sup>1</sup>

During the meeting, we discussed various points raised in ITTA's comments on the NPRM.<sup>2</sup> We emphasized that the Commission should fully fund separate budgets for the A-CAM program and legacy support mechanisms. Both programs are meritorious and should be afforded budget analyses based on their own bona fides. With the A-CAM program now funded at \$146.10 per location for all participants, the next logical and appropriate step is funding all eligible locations at \$200 per location, the target amount established by the Commission when it initiated the A-CAM program in 2016.<sup>3</sup>

Funding participants in the A-CAM program to \$200 per eligible location would require approximately \$65 million per year, while fully funding the legacy program would entail approximately \$248 million this year. Such funding would have a de minimis impact on consumers' bills. Had the Commission fully funded both the A-CAM and legacy segments in 2017, it would have led to an aggregate *eight cent* increase in average monthly universal service contributions for residential consumers.

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<sup>1</sup> *Connect America Fund et al.*, Report and Order, Third Order on Reconsideration, and Notice of Proposed Rulemaking, FCC 18-29 (Mar. 23, 2018).

<sup>2</sup> See Comments of ITTA – The Voice of America's Broadband Providers, WC Docket Nos. 10-90, 14-58, and 07-135, CC Docket No. 01-92 (May 25, 2018).

<sup>3</sup> See *Connect America Fund, ETC Annual Reports and Certifications, Developing a Unified Intercarrier Compensation Regime*, Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, 31 FCC Rcd 3087, 3107, para. 52 (2016).

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Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,

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Michael J. Jacobs  
Vice President, Regulatory Affairs

cc: Jay Schwarz